

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
FRONTIER FISHING CORP.	)	
Plaintiff,	)	
	)	
v.	)	
	)	
DONALD L. EVANS, Secretary	)	
of the U.S. Department of Commerce;	)	Civil Action
and	)	No. 04-11171-DPW
CONRAD C. LAUTENBACHER, JR.,	)	
Under Secretary for Oceans and	)	
Atmosphere/Administrator and	)	
Deputy Under Secretary,	)	
Defendants.	)	
_____	)	

**ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE BRIEF**

Defendants request that this Court permit an extension of seven days to file their Opposition to Plaintiff's Motion for Summary Judgment, up to and including May 23, 2005. In connection with this extension, Plaintiff's deadline for its Reply Brief would be due on or before May 31, 2005.

This Court has kindly permitted one extension to Defendants to file their Opposition. However, despite diligence, Defendants have been unable to complete their brief, which is based on a voluminous and technical administrative record. Defendants have made substantial progress on their pleading and will be able to complete it within the additional seven day period. This Court has been kind enough to extend filing deadlines on several occasions for Plaintiff to file its Motion for Summary Judgment.

Counsel for Plaintiff has assented to this Motion, provided that its period for filing a Reply Brief is also extended seven days.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

/s/ Anita Johnson  
ANITA JOHNSON  
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Certificate of Service and Rule 7.1 Conference

I hereby certify that I have served the foregoing upon counsel for Plaintiff, Stephen M. Ouellette, 163 Cabot Street, Beverly, MA 01915, and I have conferred with said counsel and he assented to this motion, both on this 13th day of May 2005.

/s/ Anita Johnson